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**VIA ECF AND FEDEX**

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Re: *Sjunde AP-Fonden, et al., v. Signature Bank, et al.*,  
Case No. 23-cv-01921-FB-JRC

Dear Counsel:

We represent the proposed intervenor, the Federal Deposit Insurance Corporation as Receiver for Signature Bank (“FDIC-R”), in the above-referenced action. Pursuant to the Honorable Frederic Block’s Rules of Practice, enclosed, for service, please find copies of the following documents:

- (1) FDIC-R’s Notice of Motion to Intervene and for Leave to File a Motion to Dismiss;
- (2) FDIC-R’s Memorandum of Law in Support of its Motion to Intervene with Exhibit A thereto; and
- (3) Declaration of Donald G. Grieser, with Exhibits A-E thereto.

Because Plaintiffs have not consented to the FDIC-R’s Motion to Intervene and refused to meet and confer regarding a briefing schedule in accordance with Judge Block’s Rules of Practice, we will request that Judge Block enter a briefing schedule.<sup>1</sup>

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<sup>1</sup> Plaintiffs’ position that the FDIC-R is required to submit a pre-motion conference letter is inconsistent with the Court’s Electronic Order, entered May 16, 2023, in this action in which the Court stated: “J. Block does not require pre-motion conferences on non-dispositive pre-trial motions.”

Respectfully,

/s/ Ryan A. Kane

Ryan A. Kane

Cc: The Honorable Frederic Block (*via* ECF without enclosures)